



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

July 13, 2020

By ECF

Honorable Debra Freeman  
United States Magistrate Judge  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Zeneida v. Saul*, 20 Civ. 240 (GBD) (DCF)

Dear Judge Freeman:

The requested extension is granted. Defendant's motion for judgment on the pleadings shall be filed by 9/14/2020. Plaintiff's response shall be filed by 11/13/2020. Defendant's reply, if any, shall be filed by 12/4/2020. The Clerk of Court is directed to mail a copy of this Order to Plaintiff.

Dated: 7/13/2020  
SO ORDERED

  
DEBRA FREEMAN  
United States Magistrate Judge

This Office represents the United States of America in the above-referenced action pursuant to 42 U.S.C. § 405(g) (the "Act"), challenging a decision by the Commissioner of Social Security to deny plaintiff's application for benefits. I respectfully request a sixty-day extension of the Commissioner's deadline to move for judgment on the pleadings, pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, from July 14 to September 14, 2020.

This is the Commissioner's second request for an extension of the briefing schedule. On or about July 1, I mailed to the *pro se* plaintiff, Ms. Zeneida, a letter in which the Commissioner offered to vacate the underling Administrative Law Judge's decision and stipulate to a remand of this matter to the Agency for further proceedings pursuant to the fourth sentence of the Act. I also attached a proposed Stipulation and Order. The extension is necessary to provide a sufficient opportunity for the parties to resolve this matter without Court involvement, particularly as Ms. Zeneida may need assistance in reviewing the documents that I sent her. I spoke with Ms. Zeneida by telephone today, and she consents to the requested relief.

Thank you for Your Honor's consideration of this request.

Respectfully,

AUDREY STRAUSS  
Acting United States Attorney

By: /s/ Joseph A. Pantoja  
JOSEPH A. PANTOJA  
Assistant United States Attorney  
Tel.: (212) 637-2785  
Fax: (212) 637-2750

cc: Santana Zeneida, *pro se* (by mail)